

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

DAVITA M. KEY, )  
                        )  
Plaintiff,         )  
                        )  
v.                     ) Civil Action No.  
                        ) 2:19-CV-767-ECM-SMD  
DYNAMIC SECURITY, INC., )  
                        )  
Defendant.         )

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**DECLARATION OF SONYA C. EDWARDS  
IN SUPPORT OF PETITION FOR THE AWARD OF ATTORNEYS' FEES  
AND EXPENSES**

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1. My name is Sonya C. Edwards. I have personal knowledge of the facts articulated in this declaration. I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and accurate to the best of my knowledge.
2. I am an attorney licensed in the State of Alabama who has focused my practice on employment litigation throughout the state for over eighteen (18) years. I am a 2005 graduate of Cumberland School of Law. During law school, I served as Editor-in-Chief of the American Journal of Trial Advocacy, completed an externship with the National Labor Relations Board, and won the best oral advocate award while competing on the Moot Court National Team. I was admitted to the Alabama State Bar in 2005. I am admitted to practice in the United States District Courts for the Northern and Middle Districts of Alabama.

3. From 2005 to 2008, I was an associate in the Labor and Employment practice groups for Johnston, Barton, Proctor, & Powell, LLP and Burr and Forman, LLP, respectively. From 2008 to 2012, I served as counsel for employers in Alabama and Georgia focusing on compliance with federal employment laws. From 2012 to the present, my practice has almost exclusively been dedicated to representing private and public sector plaintiffs in federal employment litigation. I have been counsel in over 70 filed cases in federal courts in Alabama. I have been trial counsel in eight trials and have prevailed in all but one. I have handled appeals and argued cases before the Eleventh Circuit Court of Appeals and the Equal Employment Opportunity Commission Office of Federal Operations.

4. I am an active member of the National Employment Lawyers Association and serve as President and Board Member for its Alabama affiliate. I am a member of the Labor and Employment Section and the Federal Court Practice Section of the Alabama State Bar. Since 2005, I have presented at numerous seminars on federal employment law, including the Alabama State Bar Labor and Employment Section Annual Seminar, the NELA-AL Annual Conference, and the NELA-National Annual Convention.

5. I am familiar with attorney fee rates for labor and employment attorneys practicing in Alabama. The current prevailing market rate in Alabama for plaintiffs' attorneys in employment litigation ranges from \$375 to \$650 per hour, depending on the skill and experience of the litigator.

6. On July 1, 2021, Kira Fonteneau and I were awarded an hourly rate of \$450 by United States District Court Judge Corey Maze of the Northern District of Alabama following a successful jury trial in Anniston, Alabama in December 2020. The case was *Barber v. TPC of Blount County Alabama, Inc.* On March 15, 2024, in *Danny Olive, Jr. v. Tennessee Valley Authority*, I was awarded an hourly rate of \$542 in a Final Agency Decision in a federal EEO matter.

7. I have reviewed the hourly rate requested by Heather Leonard of \$500 and by Leslie Palmer of \$400 and affirm that based on their experience and expertise, that is a reasonable rate in keeping with the prevailing market rate of similarly-skilled and experienced employment law attorneys practicing in federal courts in Alabama. I have reviewed their time records and affirm that the time claimed is reasonable for a case of this nature.

I have read the above and it is true and correct to the best of my knowledge.

  
Sonya C. Edwards

Date: March 28, 2024